

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA §

V. §

DARVI HINOJOSA §

CAUSE NO. 4:24-CR-00543

OBJECTION TO GOVERNMENT’S REQUEST FOR COURT REASSIGNMENT OF CASE

DARVI HINOJOSA, by and through her attorney of record, Joyce Raynor of J. Raynor Carr & Associates, P.C., files this objection to the Government’s Notice of Related Cases. This case was originally and randomly assigned to the Honorable Keith Ellison. The Government has requested the reassignment of this case to Judge Eugene Werlein, Jr. based on other cases with allegedly overlapping charges and factual bases assigned to his court.

Mr. Hinojosa objects to the re-assignment of this case as there is no bases in law or fact to support the reassignment. The Judicial Conference of the United States has strengthened its policy governing random case assignment limiting the ability of litigants to effectively choose judges in certain cases, i.e. judge shopping. “Random case assignment promotes impartiality of the proceedings and promotes public confidence in the federal judiciary.” Judge Robert J. Conrad, Secretary of Judicial Conference.

The present indictment of Mr. Hinojosa provides no overt acts to form the bases of any overlapping of charges or facts related to any cases known to be within Judge Werlein’s court. Therefore, the re-assignment of Mr. Hinojosa’s case is unnecessary and will circumvent the U.S. Judicial Conference’s long-standing random-court assignment policy. Mr. Hinojosa urges the court to allow the unbiased process of random court assignment to remain in effect.

Respectfully submitted,

/s/ Joyce Raynor

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Certificate of Service

I certify that on the 30th day of October 2024, a copy of the foregoing document was served upon all counsel of record via the U.S. District Clerk for the Southern District of Texas CM/ECF filing system and by email.

/s/ Joyce Raynor

Joyce Raynor